



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
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December 6, 2012

**Bate Bond, Operations Manager
B. T. Redi-Mix, Inc.
1800 Boyd Avenue
P.O. Box 662
Brownsville, Tennessee 38012**

REF: Compliance Evaluation Inspection

**Permit No.'s: TNG110086- Brownsville (Haywood Co.)
TNG110375- Stanton (Haywood Co.)
TNG11 0248- Jackson (Madison Co.)**

Dear Mr. Bond,

On Wednesday, November 14, 2012, I visited with Ronnie Blaylock, Dispatcher at your Brownsville concrete Plant, and then on Thursday, November 15, 2012, I visited you at your Jackson, Tennessee facility. The purpose of my visit was to conduct a compliance evaluation inspection (CEI) of each of your three (3) facilities to determine each one's compliance status related to the State's Ready Mixed Concrete Facilities (RMCP) general permit. The unique permit number for each plant is listed above for you reference.

As you now know, these types of inspections are basically divided into three parts. The first part deals with up-dating general contact information. The second and most time consuming part is a detailed review of your Stormwater Pollution Prevention Plan (SWPPP). The third part consists of a walk-through of your facility comparing it to the drainage map contained in your SWPPP and evaluating the sight for potential pollution issues that might developed due to a qualifying stormwater event and for any issues related to the handling of your process water.

At your Brownsville Plant, I was very comfortable dealing with Ronnie Blaylock who was very knowledgeable about the RMCP Permit Program. This letter discusses the findings related to each of the three facilities.

The following is a summary of the inspection(s):

Brownsville Plant:

1. SWPPP REVIEW

- The SWPPP was found to be a very good document and following the program that is presented in your SWPPP will increase your chances to maintain a compliant position with your permit's requirements.
- Unfortunately the latest edition of your SWPPP at the Brownsville Plant was of 2009 vintage, that is, it is 2 years out of date. The SWPPP must be up-dated and signed by Mr. Timbes each year to fully comply with the requirements of the permit. You need to insure that the up-to-date SWPPP be on site and available for review.

I contacted your consultant DiAne Gordon and she assured me that the SWPPP's were up-dated for your Brownsville and Jackson Facilities. She did admit that nothing has been done on your Stanton Facility SWPPP since 2009, but that was due to the fact that it has not been in operation since it was permitted. Even though ETCA up-dates your SWPPP's each year, the bottom line is that B.T. Redi-Mix is responsible to have the most current SWPPP on-site and available for review and inspection.

- It was noted that the portable "Batch Plant" had been moved to your Jackson facility to serve as a back-up unit as required by a recent contract. I would certainly expect to note such a change in your next up-dated SWPPP.
- I noted that on page 20 of the SWPPP, it states that all new employees will be trained related to the requirements of the RMCP. The wording that is not in compliance with the permit is the statement that says "refresher training sessions will be conducted as necessary." The permit requires "annual training" of employees. This annual training needs to be incorporated into your training program and documented.
- Mr. Blaylock informed me that you have not used the diesel fuel tank for about two (2) years. This should be noted in Table 1.
- On page 19 there is a section titled "SECONDARY BMP IMPLEMENTATION". In the opinion of this inspector, the fourth sentence needs to be re-written. It appears that it is trying to say the following:

If the NPDES permit requirements are in violation, then the following options should be considered and evaluated:

1. The installation of a coagulation/ precipitation system or a neutralization system.
2. Recycling of the discharge and admixtures/ plasticizers.

3. Substitute less or non-toxic materials for toxic materials.
4. Consider an oil/ water separator

As this inspector reads the narrative, it appears to say that you should do these things and not just evaluate.

- This facility had two Total Suspended Solid (TSS) violations over the past 12 months. One in May, 2012 (150/ 50 mg/l limit), and a second in November, 2011 (59/ 50 mg/l limit). These violations were from Outfall 001 MX. No other violation were noted.

2. SITE REVIEW

- There were two areas that needed some additional berming. The first area noted was a stretch along the railroad near the area where the concrete is removed from inside the trucks. The second area was between the sedimentation basins and a circular berm right along the top bank of Little Nixon Creek.
- A noticeable amount of red sand was found in Little Nixon Creek on the north side of the bridge. It was discovered that this was a direct result of the flow coming from the conveyor, elevator area. It was mutually agreed to redirect that flow into the sedimentation basins.

Jackson Plant:

3. SWPPP REVIEW

- The most current SWPPP presented for review at this facility was a 2006 edition.
- The same comments found in bullet 2 under the Brownsville SWPPP heading, apply also to the Jackson facility's SWPPP.
- As was true at the Brownsville Plant, the diesel tanks (within containment) are not currently in use. (Needs to be noted in the new SWPPP).

4. SITE REVIEW

- The new portable batch plant relocation project to this facility was nearing completion. (Needs to be noted in the new SWPPP).
- As we reviewed the site, it appeared that the drainage-site map needs an overall up-dating. The new office was missing and the area around the existing conveyor was not up-to-date. The site plan needs to be up-dated with the new batch plant

along with the new office and with the existing facilities that do not appear to match-up with the existing structures.

- It appeared that adding some hay bales in the flow-way of 001's PW/SW discharge, just prior to the weedy area would be a prudent effort to resist the migration of solids off of the facility.
- This facility had two TSS violations, and one iron violation over the past 12 months. In November, 2011, TSS was 383 (*this is significant*) compared to the 50 mg/l maximum limit. In April, 2012, the TSS was 63 mg/l, and in January, 2012, the parameter of Total Recoverable Iron was 7.79 mg/l compared to the 5 mg/l maximum.

Stanton Plant:

This facility has been inactive since it was permitted in 2009. The explanation is that the Stanton facility was set-up in for the anticipation of the Mega Site construction some time in the future. Due to this fact, this inspector did not review the SWPPP nor visit the site. As previously stated, I did contact your consultant and was advised that the SWPPP has not been up-dated since it was written in 2009 but it would be up-dated during the active plant up-dates for the new year. This inspector did visit the site this past summer.

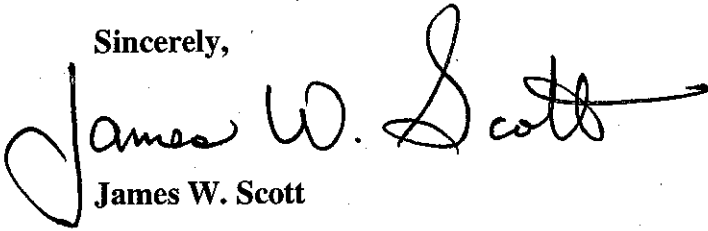
It should be noted that you have been consistent on submitting your monthly DMR's. No action other than the SWPPP up-date is required until the facility becomes active. Continue, however, to submit your quarterly DMR's as required by the new RMCP.

ACTION ITEMS:

1. The new Ready Mixed Concrete Facilities General Permit (RMCP) became in effective November 15, 2012. You need to submit your new Notice of Intent (NOI) to our Permit Section in our Nashville Central Office as soon as possible.
2. Once each of your three SWPPP's are up-dated, make sure you keep one on file at each of the facilities available for review, along with supporting documentation. Supporting documentation would include your annual employee stormwater training, as well as your inspections and your Quarterly Discharge Monitoring Reports (DMR).
3. Follow through with the noted enhancements at the facilities, additional berms and hay bales, etc.

I appreciate the couterisy shown to me during these inspections. If you have any questions concerning this letter or any other issue that you think I might be able to assit you with, feel free to call me at 731.512.1362 or by email at James.W.Scott@tn.gov.

Sincerely,

A handwritten signature in cursive script that reads "James W. Scott". The signature is written in black ink and is positioned above the printed name.

James W. Scott

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CC Bill Timbes, Owner
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Ben Matthews
File